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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

RONALD J. AMBROSETTI,

Plaintiff,

vs.

NAVIENT CORPORATION,  
NAVIENT SOLUTIONS, INC., and  
NAVIENT SOLUTIONS LLC,

Defendants.

Case No.: 2:23-cv-02560--WLH-AS

**DECLARATION OF DONALD J.  
SCHMID IN SUPPORT OF  
REQUEST FOR REMOTE  
ATTENDANCE AT SUMMARY  
JUDGMENT HEARING**

The Hon. Wesley L. Hsu  
Courtroom Number: 9B  
Date & Time of Hearing: Oct. 6, 2023  
at 1:30 p.m.

I, Donald J. Schmid, declare that:

1. I am an attorney licensed to practice in the State of California (and  
Indiana) and I am the owner of the law firm of Law Offices of Donald J. Schmid

1 LLC, which represents plaintiff Ronald J. Ambrosetti in this action. I have  
2 personal knowledge of the facts set forth in this declaration and if called as a  
3 witness I could and would competently testify to such facts under oath. I make this  
4 declaration in support of my request to appear remotely at the upcoming MSC.  
5

6 2. I am the sole counsel for plaintiff Mr. Ambrosetti in this case.  
7

8 3. Defendant Navient Solution, LLC has filed a motion for summary  
9 judgment. The joint brief was filed September 7, 2023 and the hearing on the  
10 motion has been noticed for October 6, 2023 at 1:30 p.m. before this Court.  
11

12 4. Prior to the noticing of the hearing on the motion for summary  
13 judgment in this case, the federal court in the Northern District of Indiana  
14 scheduled an evidentiary hearing to commence on October 5, 2023 in South Bend,  
15 Indiana in *United States v. Philip Yoder*, 3:18-cr-00087-JD-MGG. I am sole  
16 counsel for the defendant in that case and I am court-appointed.  
17

18 5. I also have a significant family commitment on October 7, 2023. This  
19 family commitment is in Michigan. It was planned more than three months ago.  
20

21 6. Because of the October 5, 2023 evidentiary hearing in federal court  
22 Indiana and the family commitment in Michigan on October 7, 2023, it would be  
23 impractical for me to appear in person at the at the oral argument in Los Angeles,  
24 California on the pending summary judgment motion scheduled for October 6,  
25 2023 before this Court.  
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1           7.     I therefore request the permission of this Court to attend the summary  
2 judgment motion oral argument remotely via video conference or telephone  
3 conference.  
4

5           8.     A meet and confer was held with opposing counsel consistent with  
6 Local Rule 7-3 concerning this matter. Counsel for defendant indicated on  
7 September 15, 2023 in writing no opposition to this request for remote appearance.  
8

9           9.     I declare under penalties of perjury that the foregoing statements are  
10 true and correct and that this declaration was executed on September 15, 2023.  
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13                                 /s/ Donald J. Schmid  
14                                 Donald J. Schmid  
15                                 (CA Bar No. 120178)  
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